

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: DARRYL SPIVEY

SHARON BLALARK : CHAPTER 13
:
DEBTORS : CASE NO: 14-11312

OBJECTION TO PROOF OF CLAIM NO. 3

AND NOW, Debtors, Darryl Spivey and Sharon Blalark, by and through their counsel, Michelle Lee , Esquire of the Law Offices of Georgette Miller, Esq. P.C., hereby file this Objection to Proof of Claim No. 3 and in support thereof, respectfully aver as follows:

1. Palisades Acquisitions IX LLS through its agent Vativ Recovery Solutions LLC dba SMC filed a proof of claim for debt seeking \$ 623.21 for an old telephone bill. See a true and correct copy attached hereto as Exhibit "A".
2. The debt was transferred to a collections agency on November 9, 2006
3. The last bill sent, per the proof of claim, was October 21, 2003.
4. Debtors also maintain that they have not paid this bill since 2003.
5. Based on the above, the claim must be barred by the statute of limitations under 42 Pa. C.S.A. §5525, as the claim was last paid more than four years ago.

WHEREFORE, Debtors respectfully request that this Honorable Court disallow Proof of Claim No 3 in its entirety.

12/5/16

Respectfully Submitted,

/s/ Michelle Lee
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